

Hearing Date: March 30, 2023 at 11:00 a.m. (Prevailing Eastern Time)

WHITE & CASE LLP

J. Christopher Shore
Philip Abelson
David Turetsky
Michele J. Meises
1221 Avenue of the Americas
New York, NY 10020
Telephone: (212) 819-8200
Facsimile: (212) 354-8113

– and –

Gregory F. Pesce (admitted *pro hac vice*)
111 South Wacker Drive, Suite 5100
Chicago, IL 60606-4302
Telephone: (312) 881-5400
Facsimile: (305) 881-5450

Proposed Counsel to Official Committee of Unsecured Creditors

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

Re: Docket No. 135

**THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS'
RESERVATION OF RIGHTS WITH RESPECT TO DEBTORS'
APPLICATION FOR AN ORDER (I) ESTABLISHING BAR DATES
FOR FILING PROOFS OF CLAIM; (II) APPROVING PROOF OF
CLAIM FORMS, BAR DATE NOTICES, AND MAILING AND PUBLICATION
PROCEDURES; (III) IMPLEMENTING UNIFORM PROCEDURES REGARDING
503(B)(9) CLAIMS; AND (IV) PROVIDING CERTAIN SUPPLEMENTAL RELIEF**

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's tax identification number (as applicable), are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 250 Park Avenue South, 5th Floor, New York, NY 10003.

The Official Committee of Unsecured Creditors (the “**Committee**”) appointed in the cases of the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”), states as follows in support of this reservation of rights with respect to the *Debtors’ Application for an Order (I) Establishing Bar Dates for Filing Proofs of Claim; (II) Approving Proof of Claim Forms, Bar Date Notices, and Mailing and Publication Procedures; (III) Implementing Uniform Procedures Regarding 503(b)(9) Claims; and (IV) Providing Certain Supplemental Relief* [Docket No. 135] (the “**Bar Date Application**”):

Reservation of Rights

Prior to and following the filing of the Bar Date Application, the Committee and the Debtors’ respective counsel have engaged in discussions regarding certain potential modifications to the Bar Date Application, including the proposed form of order, the form of proof of claim form, and the relevant notices. Those discussions remain ongoing, but have not yet resulted in a consensual resolution. To the extent that any issues are not consensually resolved prior to the hearing to consider the Bar Date Application, the Committee reserves all rights with respect to the Bar Date Application, including the Committee’s right to be heard at the hearing at which the Bar Date Application shall be considered, to object to the relief sought therein, and to seek any other appropriate relief from this Court.

Dated: March 23, 2023
New York, New York

Respectfully submitted,

By: /s/ Gregory F. Pesce

WHITE & CASE LLP

J. Christopher Shore
Philip Abelson
David Turetsky
Michele J. Meises
1221 Avenue of the Americas
New York, NY 10020
Telephone: (212) 819-8200
Facsimile: (212) 354-8113
E-mail: cshore@whitecase.com
philip.abelson@whitecase.com
david.turetsky@whitecase.com
michele.meises@whitecase.com

– and –

Gregory F. Pesce (admitted *pro hac vice*)
111 South Wacker Drive, Suite 5100
Chicago, IL 60606-4302
Telephone: (312) 881-5400
Facsimile: (305) 881-5450
E-mail: gregory.pesce@whitecase.com

*Proposed Counsel to Official
Committee of Unsecured Creditors*